



RON CHAPMAN, MD, MPH  
Director & State Health Officer

State of California—Health and Human Services Agency  
California Department of Public Health



EDMUND G. BROWN JR.  
Governor

November 22, 2013

System No. 3910006

Mr. Scot Moody  
General Manager  
Stockton East Water District  
P.O. Box 5157  
Stockton, CA 95205

**TRANSMITTAL OF COMPLIANCE ORDER NO. 03-10-13R-002**

This letter transmits Compliance Order No. 03-10-13R-002 to the Stockton East Water District (District) for the recent violation of the Stage 2 Disinfection Byproduct precursor treatment technique. Specifically, the District is in violation of Section 64536(a)(2), Title 22, California Code of Regulations, which requires that the system's treated water total organic carbon (TOC) level be less than 2.0 mg/L, calculated quarterly as a running annual average. The initial violation occurred with the four quarter running average through June 2013 and monthly monitoring conducted at the direction of the Department during July through September also exceeds the requirement that treated water TOC be less than 2.0 mg/L.

Please respond to the Directives in the Compliance Order by the deadlines established with each item. If you have any questions regarding this matter, please contact Bhupinder Sahota at (209) 948-3881 or me at (559) 447-3132.

Sincerely,

Carl L. Carlucci, P.E.  
Supervising Sanitary Engineer  
Central California Section  
SOUTHERN CALIFORNIA BRANCH  
DRINKING WATER FIELD OPERATIONS

Enclosures

H:\SSF\SJ County\3910006\2013\Compliance Order No. 03-10-13R-002 Transmittal Letter

STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH

IN RE: STOCKTON EAST WATER DISTRICT  
Water System No. 3910006

TO: Scot Moody, General Manager  
Stockton East Water District  
P. O. Box 5157  
Stockton, CA 95205

COMPLIANCE ORDER FOR NONCOMPLIANCE  
OF DISINFECTION BYPRODUCT PRECURSOR  
TREATMENT TECHNIQUE REQUIREMENTS

Issued on November 22, 2013

Section 116655, Chapter 4, Part 12, Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a compliance order for failure to comply with a requirement of the California Safe Drinking Water Act, or any regulation, standard, permit, or order issued hereunder.

**FINDINGS**

The Stockton East Water District (hereinafter "District") is a wholesale water system that supplies water for domestic purposes to the greater Stockton Metropolitan area. The District receives raw water from either the Calaveras River or the Stanislaus River. The raw water is treated by means of conventional filtration treatment.



1 Beginning on January 1, 2002, U.S. EPA's Stage 1 Disinfectants/Disinfection By-Products  
2 (D/DBP) Rule required community water systems using approved surface water and serving  
3 10,000 or more persons to begin monitoring and reporting disinfection byproduct levels and  
4 residual disinfectant levels to the California Department of Public Health (Department).

5  
6 The D/DBP Rule applies to any community and non-transient non-community water system  
7 that treats their water with a chemical disinfectant in any part of the treatment process or  
8 which provides water that contains a chemical disinfectant. The D/DBP Rule also  
9 established treatment technique requirements for disinfection byproduct precursors (DBPP)  
10 which requires the removal of specified percentages of organic materials, measured as total  
11 organic carbon (TOC) that may react with disinfectants to form disinfection byproducts  
12 (DBPs). Removal is achieved through a treatment technique (enhanced coagulation or  
13 enhanced softening) unless a system meets the alternative criteria. The D/DBP Rule has  
14 been adopted for California and became effective June 17, 2006. Prior to this date, any  
15 non-compliance issues were referred to U. S. EPA for enforcement action.

16  
17 Pursuant to Section 64534.6(a), the District is required to take paired TOC (source water  
18 and treated water) samples and one source water alkalinity sample per month at a time  
19 representative of normal operating conditions and influent water quality. TOC and  
20 alkalinity in the source water shall be monitored prior to any treatment and at the same time  
21 as TOC monitoring in the treated water. TOC in the treated water shall be monitored no  
22 later than the point of combined filter effluent turbidity monitoring and shall be  
23 representative of the treated water.

24  
25 These regulations require that water systems using a conventional filtration treatment  
26 process for surface waters achieve acceptable levels of TOC removal at their treatment  
27 plant. In accordance with Section 64534.6(b) of the D/DBP Rule, a system that maintains



1 an average treated water TOC of less than 2.0 mg/l for two consecutive years may reduce  
2 monitoring for both TOC and alkalinity to one paired TOC sample and one source water  
3 alkalinity sample per plant per quarter. For the two-year period (March 2001 through  
4 March 2003) the average treated water TOC was 1.34 mg/l and the District was authorized  
5 to reduce the frequency of monitoring to quarterly. However, Section 64534.6(b) also  
6 requires a water system to revert to monthly monitoring in the first month following the  
7 quarter that the annual average treated water TOC was equal to or greater than 2.0 mg/l.  
8 From 2003 through the quarterly monitoring of March 2013, the District met the  
9 performance standard of treated water TOC of less than 2.0 mg/L.

10

11 With the June 2013 quarterly monitoring, the RAA for treated water TOC was 2.175 mg/L.  
12 The District was directed by the Department to begin monthly monitoring of source water  
13 alkalinity and paired TOC starting in July 2013. With the monthly monitoring, the District  
14 began basing compliance on the criteria for systems required to meet the enhanced  
15 coagulation or enhanced softening requirements, which are based on achieving a TOC  
16 Percent Removal Ratio. The TOC Percent Removal Ratio is the percent of TOC removed  
17 relative to the percent of TOC removal required. An RAA of monthly ratios calculated  
18 quarterly, that is greater than or equal to 1.00 is required to remain in compliance.

19

20 The monthly monitoring for D/DBP compliance for June 2013 through October 2013  
21 indicates the District has failed to meet the standard of TOC Percent Removal Ratio of 1.00  
22 or greater for each of those months. Although the District has only five consecutive months  
23 thus far of determining TOC Percent Removal, prior to initiating monthly monitoring, the  
24 four quarters of treated water TOC with a RAA of 2.175 mg/L constitutes a violation of  
25 Disinfection Byproduct Precursor Compliance. The third quarter (July – September 2013)  
26 data also indicates failure to meet the RAA for treated water TOC of less than 2.0 mg/L.  
27 Compliance is based on a running annual average as specified in Section 64536.4.



1 Attachment A includes the alternative compliance criterion (Treated water TOC<2.0 mg/L)  
2 for four consecutive quarters through June 2013 and the consecutive monthly TOC Percent  
3 Removal Ratios since June 2013.

4  
5 **Specifically, the District has failed to comply with the disinfection byproduct**  
6 **precursor treatment technique requirement as specified in Section 64536(a), Title 22,**  
7 **California Code of Regulations (CCR).**

8  
9 **CONCLUSIONS OF LAW**

10 Based on the above Findings, the Department has determined that the District has violated  
11 provisions contained in the California Health and Safety Code (CHSC) and Title 22,  
12 California Code of Regulations (CCR). These violations include, but are not limited to, the  
13 following:

- 14  
15 1. CHSC Section 116555 (a)(3): Specifically, the District has failed to ensure the  
16 system is provided with a reliable and adequate source of pure, wholesome,  
17 healthful and potable water.  
18  
19 2. CCR, Section 64536(a): Specifically, the District has failed to comply with the  
20 disinfection byproduct precursor treatment technique requirements. Section 64536.4  
21 determines and specifies that compliance is based on a running annual average.  
22

23 **ORDER**

24 To ensure that the water supplied by the District is at all times safe, wholesome, healthful,  
25 and potable, and pursuant to Section 116555 of the CHSC, the District is ordered to take the  
26 following actions:  
27



1 1. a) Cease and Desist from failing to comply with CHSC Section 116555(a)(3)  
2 and CCR Section 64536(a) by ensuring that the system is provided with a reliable  
3 and adequate supply of pure, wholesome, healthful, and potable water, which is in  
4 compliance with all primary drinking water standards.

5  
6 b) The District shall provide quarterly public notification of its inability to meet  
7 the disinfection byproduct precursor treatment technique requirements during any  
8 month that the treated water TOC is not less than 2.0 mg/L using Attachment B.  
9 Proof of notification is required using Attachment C. A copy of the public  
10 notification form and the Proof of Notification form are due by the 10<sup>th</sup> day of the  
11 month following the quarter in which the violation occurred.

12  
13 In accordance with CCR Section 64463(c), the District (as a wholesaler) shall give  
14 public notice to the owner or operator of each of its retailer systems. A retailer is  
15 responsible for providing public notice to the persons it serves. If the retailer  
16 arranges for the wholesaler to provide the notification, the retailer shall notify the  
17 Department prior to the notice being given.

18  
19 The public notice can be provided in the local newspaper to reach persons served by  
20 the various water systems that receive water from Stockton East Water District.

21  
22 c) The District shall continue to conduct monthly sampling for disinfection  
23 byproduct precursors utilizing monthly-paired samples of the raw and treated water  
24 TOC and a raw water alkalinity sample. This monitoring shall be conducted in  
25 accordance with the approved DBP monitoring plan. The analytical results shall be  
26 reported to the Department no later than the 10<sup>th</sup> day following the month in which  
27 the sample was collected.

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d) By **December 31, 2013**, the District shall submit a corrective action plan that describes how the DBPP levels will be adequately reduced to achieve compliance with the D/DBP Rule.

e) The District shall operate the Dr. Joe Waidhofer water treatment plant to minimize formation of total Trihalomethanes and Haloacetic acids.

2. The District shall submit a written response by **December 6, 2013**, indicating its willingness to comply with the directives of this Compliance Order.

3. The Department reserves the right to make such modifications to this Order as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Order and shall be effective upon issuance. All submittals required by this Order shall be addressed to:

Bhupinder S. Sahota, P.E., Senior Sanitary Engineer  
California Department of Public Health  
Southern California Branch  
Drinking Water Field Operations  
31 East Channel Street, Room 270  
Stockton, CA 95202

4. If the District is unable to perform the tasks specified in this Order for any reason, whether within or beyond its control, and if the District notifies the Department in writing no less than five days in advance of the due date, the Department may extend the time for performance if the District demonstrates that it has used its best efforts to comply with the schedule and other requirements of this Order.

1 5. If the District fails to perform any of the tasks specified in this Order by the time  
2 described herein or by the time subsequently extended pursuant to Item 4 above, the  
3 District shall be deemed to have not complied with the obligations of this Order and  
4 may be subject to additional judicial action, including civil penalties specified in  
5 CHSC, Sections 116725 and 116730.

6  
7 6. The State of California shall not be liable for any injuries or damages to persons or  
8 property resulting from acts of omissions by the District, its employees, agents, or  
9 contractors in carrying out activities pursuant to this Order, nor shall the State of  
10 California be held as a party to any contract entered into by the District or its agents  
11 in carrying out activities pursuant to this Order.

12  
13 **PARTIES BOUND**

14 This Order shall apply to and be binding upon the Stockton East Water District, its officers,  
15 directors, agents, employees, contractors, successors, and assignees.

16  
17 **SEVERABILITY**

18 The requirements of this Order are severable, and the Stockton East Water District shall  
19 comply with each and every provision thereof notwithstanding the effectiveness of any  
20 provisions.

21  
22 **CIVIL PENALTIES**

23 Failure to comply with any provision or Compliance Schedule of the Compliance Order  
24 may result in the Department imposing additional enforcement actions (Citations) and  
25 administrative penalties.

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11-22-2013

Date



Carl L. Carlucci, P.E.  
Supervising Sanitary Engineer  
Central California Region  
SOUTHERN CALIFORNIA BRANCH  
DRINKING WATER FIELD OPERATIONS



**Attachments:**

- Attachment A: Summary of Analytical TOC Percent Removal Ratio
- Attachment B: Public Notification Template
- Attachment C: Proof of Notification

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**Quarterly Report for Disinfection Byproduct Precursors Compliance  
For Systems Meeting Alternative Compliance Criteria**

System Name: Stockton East Water District System Number: 3910006  
 Calendar Year: 2013 Source Water Sample Location: Treatment Plant Laboratory  
 Quarter: 2nd Treated Water Sample Location: Treatment Plant Laboratory

Check the box below for the alternative compliance criterion that the system is using.

Criterion	Parameter(s) to Report and Item Number
<input type="checkbox"/> Source water TOC < 2.0 mg/L, calculated quarterly as a running annual average (RAA) [Section 64536(a)(1)]	RAA of source water TOC based on monthly averages (or quarterly samples) [2]
<input type="checkbox"/> Treated water TOC < 2.0 mg/L, calculated quarterly as a RAA [Section 64536(a)(2)]	RAA of treated water TOC based on monthly averages (or quarterly samples) [3]
<input type="checkbox"/> Source water TOC < 4.0 mg/L, calculated quarterly as a RAA; source water alkalinity > 60 mg/L (as CaCO <sub>3</sub> ), calculated quarterly as a RAA; and either TTHM and HAA5 RAAs ≤ 0.040 mg/L and 0.030 mg/L, respectively, or the system applied for approval to install and operate technologies by June 30, 2005, that will limit TTHM and HAA5 to those levels [Section 64536(a)(3)]	1. RAA of source water TOC based on monthly averages (or quarterly samples) [2] 2. RAA of source water alkalinity based on monthly averages (or quarterly samples) [1] 3. RAA for both TTHM and HAA5 [8], [9]
<input type="checkbox"/> TTHM and HAA5 RAAs ≤ 0.040 mg/L and 0.030 mg/L, respectively, and the system uses only chlorine for primary disinfection and maintenance of a residual in the distribution system [Section 64536(a)(4)]	RAA for both TTHM and HAA5 [8], [9]
<input type="checkbox"/> Source water SUVA ≤ 2.0 L/mg-m measured monthly and calculated quarterly as a RAA [Section 64536(a)(5)]	RAA of source water SUVA based on monthly averages [4]
<input type="checkbox"/> Finished water SUVA ≤ 2.0 L/mg-m measured monthly and calculated quarterly as a RAA [Section 64536(a)(6)]	RAA of treated water SUVA based on monthly averages [5]
<input type="checkbox"/> Softening that results in lowering the treated water alkalinity to < 60 mg/L (as CaCO <sub>3</sub> ), measured monthly and calculated quarterly as a RAA [Section 64536(b)(1)]	RAA of treated water alkalinity [6]
<input type="checkbox"/> Softening that results in removing at least 10 mg/L of magnesium hardness (as CaCO <sub>3</sub> ), measured monthly and calculated quarterly as a RAA [Section 64536(b)(2)]	RAA of the amount of magnesium hardness removal (as CaCO <sub>3</sub> , in mg/L) [7]

Report items [1], [2], and [3], and any additional data based upon the criterion identified above.

Month	Sample Date <sup>1</sup>	Source Water Alkalinity (mg/L) [REQUIRED] [1]	Source Water TOC (mg/L) [REQUIRED] [2]	Treated Water TOC (mg/L) [REQUIRED] [3]	Source Water SUVA (L/mg-m) [4]	Treated Water SUVA (L/mg-m) [6]	Treated Water Alkalinity (mg/L) [6]	Mg Hardness Removal (as CaCO <sub>3</sub> , in mg/L) [7]
July								
August								
September	9/13/2012	30	2.3	1.6				
October								
November								
December	12/15/2012	60	4.5	2.6				
January								
February								
March	3/15/2013	40	2.2	1.6				
April								
May								
June	6/11/2013	30	3.8	2.9				
Running Annual Average (RAA):				2.175				
See TTHM/HAA5 reporting form for actual results; report RAAs here, if applicable:					TTHM RAA [8]:	40.600	HAA5 RAA [9]:	14.000

Number of paired (source water and treated water) TOC samples taken during the quarter: 1

Is the system in compliance with the alternative compliance criterion?  Yes  No

Signature: [Handwritten Signature]

Date: 7/13/13

1/9/02 \* STARTING MONTHLY



**Quarterly Report for Disinfection Byproduct Precursors Compliance  
For Systems Required to Meet the Enhanced Coagulation or Enhanced Softening Requirements**

System Name: Stockton East Water District System Number: 3910008

Calendar Year: 2013 Source Water Sample Location: Treatment Plant Lab

Quarter: 4th Treated Water Sample Location: Filter Gallery

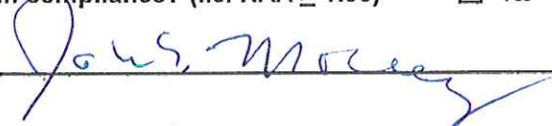
Month	Sample Date <sup>1</sup>	Source Water Alkalinity (mg/L)	Source Water TOC (mg/L)	Treated Water TOC (mg/L)	TOC Percent Removal Achieved <sup>2</sup> (%)	TOC Percent Removal Required <sup>3</sup> (%)	Assigned Value (optional, complete box below if used)	TOC Percent Removal Ratio <sup>4</sup>
January								
February								
March	3/15/2013	40	2.2	1.6	27.3	35.0		0.78
April								
May								
June	6/11/2013	30	3.8	2.9	23.7	35.0		0.68
July	7/11/2013	30	4.1	2.9	29.3	45.0		0.65
August	8/12/2013	30	4.1	3.0	26.8	45.0		0.60
September	9/10/2013	20	3.5	2.7	22.9	35.0		0.65
October	10/8/2013	10	3.6	2.7	25.0	35.0		0.71
November								
December								
<b>Running Annual Average (RAA) of TOC Percent Removal Ratio:</b>								<u>0.68</u>

*In any month that one or more of the following six conditions are met, the system may assign a monthly value of 1.00 (in lieu of calculating the TOC percent removal ratio) when calculating compliance. If this option is used during any month of this quarter, then enter below the value of the parameter and the sample date for the condition that was met.*

- Source water TOC < 2.0 mg/L. (may refer to results entered above)
- Treated water TOC < 2.0 mg/L. (may refer to results entered above)
- Source water SUVA ≤ 2.0 L/mg-m.
- Finished water SUVA ≤ 2.0 L/mg-m.
- System practicing softening removes at least 10 mg/L of magnesium hardness (as CaCO<sub>3</sub>).
- System practicing enhanced softening lowers treated water alkalinity to < 60 mg/L (as CaCO<sub>3</sub>).

Number of paired (source water and treated water) TOC samples taken during the quarter: 1

Is the system in compliance? (i.e. RAA ≥ 1.00)  Yes  No

Signature:  Date: 10/31/13

**NOTES:**

<sup>1</sup> If more than one set of samples is taken during a single month, then a separate sheet should be used for reporting the date, result, TOC percent removal achieved, TOC percent removal required, and TOC percent removal ratio of each sample set. The TOC percent removal ratios for the month should be averaged and then reported on this form to determine the running annual average.

<sup>2</sup> Actual monthly TOC percent removal =  $(1 - \frac{\text{treated water TOC}}{\text{source water TOC}}) \times 100$

<sup>3</sup> The required monthly TOC percent removal is determined from the Step 1 TOC Percent Removal table (right) or from the Step 2 TOC Percent Removal method.

Source Water TOC (mg/L)	Step 1 Required Removal of TOC		
	Source Water Alkalinity (mg/L as CaCO <sub>3</sub> )		
	0-60	>60-120	>120
>2.0-4.0	35.0%	25.0%	15.0%
>4.0-8.0	45.0%	35.0%	25.0%
>8.0	60.0%	40.0%	30.0%

1/9/02

## Instructions for Tier 2 DBP Precursor Treatment Notice Template

### Template Attached

Since disinfection byproduct (DBP) precursor treatment technique violations are included in Tier 2, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.4(b)]. Some disinfection problems may be serious. **Each water system required to give public notice must submit the notice to the Department for approval prior to distribution or posting, unless otherwise directed by the Department [64463(b)].**

### Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

<i>If You Are a...</i>	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
Community Water System [64463.4(c)(1)]	Mail or direct delivery <sup>(a)</sup>	Publication in a local newspaper
		Posting <sup>(b)</sup> in public places served by the water system or on the Internet
		Delivery to community organizations
Non-Community Water System [64463.4(c)(2)]	Posting in conspicuous locations throughout the area served by the water system <sup>(b)</sup>	Publication in a local newspaper or newsletter distributed to customers
		Email message to employees or students
		Posting <sup>(b)</sup> on the Internet or intranet
		Direct delivery to each customer

(a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

(b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

The notice attached is appropriate for the methods described above. However, you may wish to modify it before using it for posting in public places served by the water system. If you do, you must still include all the required elements and leave the health effects and notification language in italics unchanged. This language is mandatory [64465].

## Multilingual Requirement

Spanish. Each public notice must contain information in Spanish regarding (1) the importance of the notice or (2) contain a telephone number or address where Spanish-speaking residents may contact the water system to obtain a translated copy of the public notice or assistance in Spanish.

Non-English Speaking Groups Other than Spanish-Speaking. For each group that exceeds 1,000 residents or 10% of the residents in the community served, whichever is less, the public notice must (1) contain information in the appropriate language(s) regarding the importance of the notice or (2) contain a telephone number or address where such residents may contact the water system to obtain a translated copy of the notice or assistance in the appropriate language.

## Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

## Description of the Violation

Choose from the following descriptions of violations and modify to fit your situation.

- Step 1 (or Step 2) TOC Removal – “We routinely monitor for Total Organic Carbon (TOC) in our source and treated water and alkalinity in our source water. This information tells us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, we achieved [number – number]% removal of TOC and were required to achieve [number – number]% removal of TOC. As we did not achieve the required removal of TOC, as an average over the past 12 months, we did not demonstrate effective DBP precursor removal.”
- Alternative Compliance Criteria<sup>1</sup>
  - Source Water TOC – “We routinely monitor for Total Organic Carbon (TOC) in our source water. This measurement tell us whether the natural organic matter in our source water is low enough so that no further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source water TOC varied from [number – number] mg/L and resulted in an annual average of [number] mg/L. The standard is that the source water TOC level must be less than 2.0 mg/L.
  - Treated Water TOC – “We routinely monitor for Total Organic Carbon (TOC) in our treated water. This measurement tell us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply.

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<sup>1</sup> Suggested language for systems that practice softening is not provided as there are no systems in California that practice softening.

During the past 12 months, our treated water TOC varied from [number – number] mg/L and resulted in an annual average of [number] mg/L. The standard is that the treated water TOC level must be less than 2.0 mg/L.

- Source Water TOC, Source Water Alkalinity, and Distribution System TTHM and HAA5 – “We routinely monitor for Total Organic Carbon (TOC) and alkalinity in our source and total trihalomethanes (TTHM) and haloacetic acids (five) (HAA5) in our distribution system. These measurements tell us whether or not further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source and distribution system monitoring had the results shown in the table below. We met [number] of [number] standards. We are required to meet all the standards.

Parameter	Results		
	Range (mg/L)	Average (mg/L)	Standard (mg/L)
TOC	[number – number]	[number]	Less than 4.0
Alkalinity	[number – number]	[number]	Greater than 60
TTHM	[number – number]	[number]	No Greater Than 0.040
HAA5	[number – number]	[number]	No Greater Than 0.030

- Source Water SUVA – “We routinely monitor for Specific Ultraviolet Absorbance (SUVA) in our source. This measurement tell us whether the natural organic matter in our source water is low enough so that no further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source water SUVA varied from [number – number] L/mg-m and resulted in an annual average of [number] L/mg-m. The standard is that the source water SUVA level must be less than or equal to 2.0 L/mg-m.
- Treated Water SUVA – “We routinely monitor for Specific Ultraviolet Absorbance (SUVA) in our treated water. This measurement tells us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our treated water SUVA varied from [number – number] L/mg-m and resulted in an annual average of [number] L/mg-m. The standard is that the treated water SUVA level must be less than or equal to 2.0 L/mg-m.

**Corrective Action**

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with DBP precursor treatment technique violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We added [chemicals or a new treatment process] to improve DBP precursor removal”.
- “We changed our chemical dosing to improve DBP precursor removal”.

- "We removed the source from use".

### **After Issuing the Notice**

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the Department within ten days after you issue the notice [64451(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the Department sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a "problem corrected" notice when the violation is resolved.

## IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.  
Tradúzcalo o hable con alguien que lo entienda bien.

**[System]**

### **Did Not Meet Treatment Requirement (Disinfection Byproduct Precursors)**

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

[Describe the violation - use descriptions from instructions].

#### **What should I do?**

- **You do not need to boil your water or take other actions.**
- This is not an emergency. If it had been, you would have been notified immediately.
- *Total organic carbon (TOC) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (THMs) and haloacetic acids (HAAs). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.*
- [Option for water systems: Water systems may wish to include a statement describing their compliance with THM/HAA5 requirements, if applicable]
- If you have other health issues concerning the consumption of this water, you may wish to consult with your doctor.

#### **What happened? What is being done?**

[Describe corrective action]. [TOC, SUVA, TTHM, HAA5, etc.] so far this [time period] have met all requirements.

For more information, please contact [name of contact] at [phone number] or [mailing address].

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.*

## Secondary Notification Requirements

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- **SCHOOLS:** Must notify school employees, students, and parents (if the students are minors).
- **RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS** (including nursing homes and care facilities): Must notify tenants.
- **BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS:** Must notify employees of businesses located on the property.

This notice is being sent to you by [system].

State Water System ID#: \_\_\_\_\_. Date distributed: \_\_\_\_\_.

**Drinking Water Notification to Consumers**

**PROOF OF NOTIFICATION**

**Name of Water System:** \_\_\_\_\_

Please explain what caused the problem if you have determined what it was and what steps you have taken to correct it. \_\_\_\_\_  
\_\_\_\_\_

Consumers Notified \_\_\_\_\_ Yes \_\_\_\_\_ No

If not, Explain: \_\_\_\_\_  
\_\_\_\_\_

Date of Notification: \_\_\_\_\_

On the date of notification set forth above, I served the above referenced document(s) on the consumers by:

\_\_\_\_\_ Sending a copy through the U.S. Mail, first class, postage prepaid, addressed to each of the resident(s) at the place where the property is situated, pursuant to the California Civil Code. Attach copy of Notice.

\_\_\_\_\_ Newspaper (if the problem has been corrected). Attach a copy of Notice.

\_\_\_\_\_ Personally hand-delivering a copy to each of the consumers. Attach a copy of Notice.

\_\_\_\_\_ Posted on a public bulletin board, that will be seen by each of the consumers (for small, non-community water systems with prior Department approval). Attach copy of Notice.

**I hereby declare the forgoing to be true and correct under penalty of perjury.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Signature of Person Serving Notice

**\*\*Notice:** Complete this Proof of Notification and return it along with a copy of the notification to the Department within 10 days of giving public notice.

Disclosure: Be advised that the California Health and Safety Code states that any person who knowingly makes a false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by fine of not more than twenty-five thousand dollars (\$25,000) for each day of violation, or be imprisoned in county jail not to exceed one year or by both the fine and imprisonment.